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ENDORSEMENT: Request GRANTED on consent. Fact discovery shall be completed by 2/28/2020. SO ORDERED.

Dated: 1/18/2020



January 17, 2020

VIA ECF

Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Francis Quinn, Jr. and Lori Quinn v. Consolidated Edison Company of
New York, Inc.
19-CV-6538 (RA)(SDA)
Our File: 710-1032

Dear Judge Aaron:

We represent defendant Consolidated Edison Company of New York, Inc. ("Con Edison") in this action. This letter is respectfully submitted, on consent of plaintiffs, for an extension of the fact discovery deadline until February 28, 2020. The current deposition deadline is February 28, 2020, and the parties wish to be able to conduct meaningful discovery with the depositions. A settlement conference is scheduled before your Honor on Tuesday, February 6, 2020, and the parties have and continue to undertake extensive efforts in working up and moving this case along in an effort to have a meaningful settlement conference before your Honor.

This office proceeded with plaintiffs Francis Quinn's and Lori Quinn's deposition on December 11, 2019 and December 12, 2019, respectively. Con Edison then promptly produced Ms. Jennifer Grim on its behalf for a deposition on December 16, 2019. Several discovery demands were thereafter made by both parties, and the parties have been working on responding to each other's requests. Plaintiffs also requested the deposition of another witness on behalf of Con Edison, and upon prompt efforts identifying the appropriate witness, the parties were most recently able to schedule the deposition for January 29, 2020.

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HEIDELL, PITTONI, MURPHY & BACH, LLP

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Being given the opportunity to complete fact discovery by the deposition deadline is important to the parties' abilities to properly evaluate theories and damages. The extension will also assist both parties for their respective positions, and to be able to meaningfully prepare and for the settlement conference.

Thank you for your consideration.

Respectfully submitted,



Silvia D. Manashirov, Esq. (SDM 5307)

SDM/ot

cc: **VIA ECF**

Joseph Napoli, Esq.
Napoli Shkolnik, PLLC